

Exhibit B

(Transcript of Plaintiff's Jurisdictional
Deposition dated January 14, 2020)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

TIMOTHY POWERS,

Plaintiff,

Docket No.

17-CV-1336 (ADS) (ARL)

-against-

ROMAN CATHOLIC DIOCESE OF ROCKVILLE CENTRE,
ST. MARTINS TOURS CHURCH and ROBERT
GUGLIELMONE,

Defendants.

-----X

666 Old Country Road
Garden City, New York

January 14, 2020
5:00 p.m.

DEPOSITION OF TIMOTHY EDWARD POWERS, the
Plaintiff herein, taken by the Defendant,
pursuant to Federal Rules of Civil
Procedure, held at the above-mentioned time
and place, before Dolly Fevola, Notary
Public of the State of New York.

1

2

2

A P P E A R A N C E S :

3

MERSON LAW, PLLC
Attorneys for the Plaintiff
150 East 58th Street
34th Floor
New York, New York 10155
BY: GIOVANNA MABILE, ESQ.

7

BARKET EPSTEIN KEARON ALDEA & LOTURCO, LLP
Attorneys for the Defendant,
ROBERT GUGLIELMONE
666 Old Country Road,
Suite 700
Garden City, New York 11530
BY: ALEXANDER KLEIN, ESQ.

8

9

10

11

12

MULHOLLAND MINION DUFFY DAVEY MCNIFF BEYRER
Attorneys for the Defendant,
ST. MARTINS TOURS CHURCH
374 Hillside Avenue
Williston Park, New York 11596
BY: BRIAN R. DAVEY, ESQ.

13

14

15

16

JONES DAY
Attorneys for the Defendant,
ROMAN CATHOLIC DIOCESE OF
ROCKVILLE CENTRE
250 Vesey Street
New York, New York 10281
BY: TODD JEREMIAH, ESQ.

17

18

19

20

21

22

23

24

25

IT IS HEREBY STIPULATED AND
AGREED by and between the attorneys
for the respective parties herein,
that the filing, sealing and
certification of the within
deposition be waived.

IT IS FURTHER STIPULATED AND
AGREED that all objections, except
as to the form of the question,
shall be reserved to the time of the
trial.

IT IS FURTHER STIPULATED AND
AGREED that the within deposition
may be sworn to and signed before
any officer authorized to administer
an oath with the same force and
effect as if signed and sworn to
before the Court.

- oOo -

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

4

T I M O T H Y E D W A R D P O W E R S,
after having been first duly sworn by a
Notary Public of the State of New York, was
examined and testified as follows:

(BY THE REPORTER:)

Q State your name for the record,
please?

A Timothy Edward Powers.

Q State your address, please.

A Paradise Park Resort
Condominiums, Soi Wat Boon, Pattaya,
Thailand 20150.

MR. KLEIN: The time is 5:07.

Good morning, Mr. Powers.

EXAMINATION BY

MR. KLEIN:

Q When you lived in Colorado,
what was your address?

A 12404 East Pacific Circle, Unit
A, Aurora, Colorado. I don't remember the
zip. 81003, I believe but I can't remember.

Q And what were the years during
which you lived at that address?

A From 2010 until 2015.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

5

Q Did you have a bank account in Colorado?

A I have one at Charles Schwab. It's not per se a bank. It's a virtual kind of thing online.

Q Was there a bank branch that you used in Colorado?

A No.

Q How did you get money when you lived in Colorado?

A Well, when I lived in Colorado, I had a company bank account and personal bank account.

Q Was the personal bank account at a location in Colorado?

A Correct.

Q Where? What town?

A Compass Bank.

Q Do you still have that bank account?

A I do not.

Q When did it close?

A 2015.

Q And the other bank account that

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

6

you mentioned, what kind of bank account was it?

A Business bank account.

Q Where was that held?

A Compass Bank as well.

Q Is that bank still opened -- bank account still open?

A It is not. Closed in 2015 as well.

Q Who, if anyone, were you living with in Colorado?

A I lived alone.

Q And what exactly were the years?

A I lived in Denver from 2005 till 2015.

Q Did you ever live in Colorado before that?

A Yes. I moved to Colorado from California in '86, I believe. So '86 to Colorado Springs until 2005 where I moved to Denver.

Q So you lived in Colorado the state from 1986 until 2015?

1

T. Powers

7

2

A Correct.

3

4

Q And when you were living there,
you intended to stay there during that time
until you left?

5

6

7

8

A Yeah. I did not know about
Thailand until 2013. That was my first
visit out here.

9

10

11

12

Q Prior to living in Colorado --
I'm sorry. Were you living in Colorado in
1987 when you were charged with a property
crime?

13

14

15

16

A Yes.

Q Were you living in Colorado in
January of 1988 when you were charged with
burglary?

17

18

19

20

21

MS. MABILE: Note my objection.

A Yes.

Q Were you living in Colorado in
July of 1988 when you were charged with
burglary again?

22

23

24

25

A Yes.

MS. MABILE: Note my objection.

Q Were you living in Colorado in
March of 1989 when you were charged with

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

8

conspiracy to commit robbery?

MS. MABILE: Note my objection.

A Yes.

Q Were you living in Colorado in August of 1989 when you were charged with three counts of theft, second degree burglary, a property crime, fraud in the form of impersonation, driving under the influence, driving under the influence of drugs, as well as other offenses?

A Yes.

MS. MABILE: Note my objection.

Q Were you living in Colorado in April of 1996 when you were charged with violating conditional release order?

A Yes.

MS. MABILE: Note my objection.

Q Were you living in Colorado in 1988 when you were charged with a parole violation?

A Yes.

Q Were you living in Colorado in December of 2005 when you were charged with assault, menacing in the fifth degree?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

9

MS. MABILE: Note my objection.

A Yes.

Q Were you living in Colorado --

A You covered my criminal
background.

Q That's it?

A I think so.

Q Were you living in Colorado in
December of 2005 when you were charged with
disorderly conduct for displaying a weapon?

MS. MABILE: Note my objection.

A Yeah. That was the same
offense you just mentioned, same incident.

Q Okay. So all the other charges
in December of 2005 that you were charged
with you were living in Colorado at that
time?

A Correct.

Q And that's it? No other
criminal charges?

MS. MABILE: Note my objection.

Don't answer that. That's out of
the scope.

Q November of 2009, were you

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

10

living in Colorado when you were charged
with driving under the influence of alcohol?

A Yes.

MS. MABILE: Note my objection.

Q Prior to living in Colorado,
where did you live immediately before
Colorado?

A California.

Q How long had you lived in
California?

A I believe it was 1980 to 1986.

Q And prior to living in
California, where did you live immediately
before?

A New York. Long Island.

Q From what years?

A From birth, 1969 through the
end -- I think it was the end of '79. It
might have been the beginning of '80 when we
moved to California.

Q So the locations where you
lived during your life are New York,
California, Colorado and Thailand; is that
correct?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

11

A I also lived in Pennsylvania
for about a year-and-a-half in 2000 or 2001,
I believe. It might have been '01 to '02.

Q Okay. What year did you move
to Thailand?

A Can you repeat that.

Q Are you living in Thailand now?

A Correct.

Q When did you begin living in
Thailand?

A 2015. I believe November,
2015.

Q And who do you live with in
Thailand?

A My wife and two children.

Q And do you live in a house that
is owned, rented or otherwise?

A I own it.

Q You live in a house?

A Condo.

Q You own the condo?

A Condominium, correct.

Q What did you pay for the condo?

MS. MABILE: Objection.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

12

MR. KLEIN: Go ahead.

A 104,000 U.S.

Q And did you take that out using
a line of credit of some sort from a United
States bank or a Thailand bank?

A No, I paid cash.

Q Have you traveled outside of
Thailand since 2015?

A Just one time. I originally
came out here on an ED visa, educational
visa, which is good for one year and then
you have to leave the country to convert it
and I converted it to marriage, so I went to
Lau. One-day trip to Lau and came back to
Thailand.

Q So you went to Thailand using
a -- what type of visa?

A ED, educational.

Q And then, what was the
educational basis for obtaining that visa?

A I wanted to learn the Thai
language.

Q So you got an educational visa
by stating that you wanted to learn Thai?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

13

A Correct. I went to Thai school
for a year.

Q And now, what is the visa
pursuant to which you are in Thailand?

A Non O marriage.

Q Non O?

A Correct.

Q So that's a one-year visa, a
marriage visa?

A Correct. I have to renew it
every year.

Q Have you renewed it every year?

A Correct.

Q When was the last time that you
renewed it?

A Bear with me. I've got my
passport. November 23rd -- Nope, nope.
Hold on. November -- Actually, December 20,
2019.

Q And --

A So just last month.

Q What about prior to that? When
was the last time that you had renewed your
visa?

1

T. Powers

14

2

A November -- Let's see.

3

December 24, 2018, then December 18, 2017,

4

then December 21, 2016. My original, as I

5

said, my first year here was an educational

6

visa.

7

Q Have you applied for a

8

permanent resident visa?

9

A There is no path to citizenship

10

for me at all.

11

Q I'm not asking that. Have you

12

applied for a permanent resident visa?

13

A I have a Non O permanent visa.

14

That's how it works.

15

Q Are you aware that there is a

16

permanent residency visa in Thailand?

17

A Then that's what I must have.

18

I live here.

19

MS. MABILE: If you're not

20

aware of that with that name, Tim,

21

just let him know.

22

A I've never heard of it by that

23

name.

24

Q You never applied to be a

25

permanent resident of Thailand; is that

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

15

correct?

MS. MABILE: He's understanding
that --

A You cannot apply for a
permanent residency.

Q Okay.

A I don't know what you're
reading but you cannot. I've spoken to the
lawyers here and everything.

MS. MABILE: That's okay.

Q You have not applied for a
permanent residency; is that correct?

MS. MABILE: Objection to form.

A There is nothing to apply for.

Q Okay.

Where do you work in Thailand?

A I do not work. I'm retired.

Q Have you ever worked in
Thailand?

A No.

Q How do you support yourself in
Thailand?

A I have money.

Q So are you living off of

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

16

savings?

A Correct.

Q You said that you're married
with children, correct?

A Correct.

Q Is your wife a citizen of
Thailand?

A Yes, she is.

Q Are your children citizens?

A Yes, they are.

Q Did you meet your wife in
Thailand?

A Yes, I did.

Q Do your children and wife live
with you?

A Correct.

Q Yes?

A Yes.

Q Do you have a driver's license
in Thailand?

A Yes, I do.

Q Are you holding it right now?

A I can. Let me find my wallet.
Hold on a second.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

17

Q If you don't have it on you,
that's fine.

MS. MABILE: It's okay.

A It's right here. It's not a
problem. (Displaying.)

Q I can't really make it out.
Counsel has advised that she will send us a
copy so that's fine.

A No problem.

Q Do you own any real property in
Thailand other than the condo?

A Yes. I own a second rental
investment condo.

Q When you say that you own the
condo, is your name on it?

A Yes, correct.

Q Do you own it alone or jointly
with someone else?

A Alone.

Q Your condo?

A Yes. Both condos are in my
name only.

Q Did you pay for it?

A Correct. In cash.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

18

Q But your wife did not
contribute to the funds?

A No.

Q And you own separate real
property, you said?

A Yeah, I own two condos.

Q Do you have any brokerage
accounts?

A With Charles Schwab but I don't
utilize -- I don't want to take a risk of
any stock losses so I don't do any of that.
I just have cash and basically my broker's
account and my checking account.

Q In what bank is your checking
account?

A Charles Schwab.

Q To this day?

A Correct.

Q And --

A I opened it in 2015 right
before -- literally days before I moved
here.

Q We're not going to put this in
the record, the number that it is, but what

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

19

is the account number for the Charles Schwab
account?

MS. MABILE: Note my objection.

A What's that? Go ahead?

Q Yes.

MS. MABILE: Tim, if you don't
have it, it's fine.

A Okay.

Q Tim, do you have it?

A I have it.

Q Yes?

A I don't know where it is. No,
I don't know where it is. My wife is
sleeping and my kids are sleeping. I can't
turn on the lights.

Q Was this an account that you
opened while you were living in the United
States?

A Yeah. I opened it about a week
before I moved to Thailand.

Q And how far away is the closest
Charles Schwab store or bank to where you
live?

A Japan.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

20

Q So do you have any financial institutions that you use that are in Thailand?

A Sure. I have a local bank account here at the Bank of Bangkok and then what I do is I can log on with the Charles Schwab account. I type up a letter that says do a wire transfer, send them a photo of the letter signed with my passport and a day or two later they wire me the funds.

Q How much money do you keep in your Bank of Bangkok bank account?

MS. MABILE: Objection. Don't answer that.

Q Do you use a cell phone?

A Yes.

Q What's the number for your cell phone?

A It's +66 086-394-2710.

Q How long have you had that phone number?

A Since I moved here so almost five years.

Q Who is the cell service

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

21

provider?

A Tru Move.

Q How you do spell that?

A T-R-U M-O-V-E.

Q Do you pay taxes in Thailand?

A I do not.

Q Is that because there is no
income?

A Correct.

Q Is there real estate tax in
Thailand?

A There is not. Just when you
buy, not yearly. So when I bought the two
condos, I paid, I think, two-and-a-half
percent and then there is no yearly property
taxes.

Q So do you pay any taxes in
Thailand?

A I do not.

Q Have you ever?

A No. I don't meet the
threshold.

Q Are you a member of any unions
in Thailand?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

22

A No.

Q Are you a member of any churches or other religious institutions in Thailand?

A Certainly not.

Q Are you a member of any fraternal organizations in Thailand?

A No.

Q Are you a member of any clubs in Thailand?

A No.

Q Are you a member of any associations in Thailand?

A I would not say a member but I support the VFW.

Q What's the VFW?

A Veterans of Foreign Wars. There is a lot of expats here that are retired military. A lot of my friends are ex navy, army, that kind of stuff.

Q Do your children speak English?

A English and Thai.

Q How did they learn English?

A From me and then we also pay.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

23

We have them in private school and they get extra tutoring in English.

Q What does the extra tutoring cost?

MS. MABILE: Objection. Don't answer.

MR. KLEIN: No, you should answer.

If he is paying to have his kids learn English that's relevant.

MS. MABILE: How come?

MR. KLEIN: If he has no intention of moving back -- and this should not count towards the time -- then it would be less likely.

MS. MABILE: His father speaks English.

MR. KLEIN: It's relevant.

A I'll explain why.

MS. MABILE: No, you do not have to explain why.

MR. KLEIN: No, you don't have to.

MS. MABILE: I'm noting my

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

24

objection. You can answer.

Q What do you pay to have your children tutored in English?

A Their full schooling is \$900 U.S. a year.

Q What do you pay to have them tutored in English?

A That's included.

Q I thought you said there was separate schooling for the English?

A Not separate schooling. It's in their private school.

Q Do they attend any school other than their private school?

A No.

Q Is that five days a week?

A Correct, yes. Actually, my stepdaughter, the 11 year-old, she's starting six days a week now. She'll be going on Saturdays.

Q So your two children you have a son or another daughter?

A I have a stepdaughter and then my daughter who is three years old.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

25

Q So three and 11?

A Correct.

Q Do they take your last name?

A My daughter, yes. Her name is C.D. Powers. My wife's daughter is KM and she still has her Thai name but we're in the process of me trying to adopt her.

Q Do you have any arrest record in Thailand?

MS. MABILE: Objection.

A No.

Q What is your wife's name?

A Sira Wan Powers.

Q What is her maiden last name?

A That's about 27 characters long and I could not pronounce it if I tried.

Q Are the characters in English?

A No, they are not.

Q Okay. Did you meet her in Thailand?

MS. MABILE: Asked and answered.

A Yes, I did.

Q Do you have an automobile in

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

T. Powers

26

Thailand?

A Yeah. I have a car. Me and my wife have a car. I have a motorcycle, a scooter and my wife has a scooter too.

MS. MABILE: His 20 minutes are up. Thank you, Tim.

THE WITNESS: We're good to go?

MS. MABILE: Yes. Thank you.

THE WITNESS: Thanks a lot.

Bye-bye.

MR. KLEIN: Bye.

(Time noted: 5:28 p.m.)

TIMOTHY EDWARD POWERS

Subscribed and sworn to before me
this ____ day of _____, 2020.

NOTARY PUBLIC

INDEX

INDEX TO TESTIMONY

Page

Examination by Mr. Klein 4

ERRATA SHEET FOR THE TRANSCRIPT OF:
Case Name: Timothy Powers vs Roman Catholic
Diocese of Rockville Centre, et al
Deposition Date: January 14, 2020
Witness: Timothy Edward Powers

CORRECTIONS

PG	LN	NOW READS	SHOULD READ	REASON FOR
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----
---	---	-----	-----	-----

Signature

Subscribed and sworn to before me
this _____ day of _____, 2020.

(NOTARY PUBLIC)

CERTIFICATION

I, DOLLY FEVOLA, a Notary Public in
and for the State of New York, do hereby certify:

THAT the witness whose testimony is herein
before set forth, was duly sworn by me; and

THAT the within transcript is a true record
of the testimony given by said witness.

I further certify that I am not related,
either by blood or marriage, to any of the parties
to this action; and

THAT I am in no way interested in
the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 15th day of January, 2020.

DOLLY FEVOLA

\$	2017 ^[1] - 14:3	adopt ^[1] - 25:8	between ^[1] - 3:3	CHURCH ^[2] - 1:8, 2:13
\$900 ^[1] - 24:5	2018 ^[1] - 14:3	ADS (ARL ^[1] - 1:6	BEYRER ^[1] - 2:12	churches ^[1] - 22:4
'	2019 ^[1] - 13:20	advised ^[1] - 17:8	birth ^[1] - 10:18	Circle ^[1] - 4:20
'01 ^[1] - 11:4	2020 ^[5] - 1:14, 26:20, 28:3, 28:22, 29:15	AGREED ^[3] - 3:3, 3:9, 3:14	blood ^[1] - 29:10	citizen ^[1] - 16:7
'02 ^[1] - 11:4	21 ^[1] - 14:4	ahead ^[2] - 12:2, 19:5	Boon ^[1] - 4:12	citizens ^[1] - 16:10
'79 ^[1] - 10:19	23rd ^[1] - 13:18	al ^[1] - 28:3	bought ^[1] - 21:14	citizenship ^[1] - 14:9
'80 ^[1] - 10:20	24 ^[1] - 14:3	alcohol ^[1] - 10:3	branch ^[1] - 5:7	City ^[2] - 1:12, 2:10
'86 ^[2] - 6:21	250 ^[1] - 2:18	ALDEA ^[1] - 2:7	BRIAN ^[1] - 2:14	Civil ^[1] - 1:18
	27 ^[1] - 25:16	ALEXANDER ^[1] - 2:10	broker's ^[1] - 18:13	close ^[1] - 5:23
	3	almost ^[1] - 20:23	brokerage ^[1] - 18:8	closed ^[1] - 6:9
0	34th ^[1] - 2:5	alone ^[3] - 6:13, 17:18, 17:20	burglary ^[3] - 7:16, 7:21, 8:8	closest ^[1] - 19:22
086-394-2710 ^[1] - 20:20	374 ^[1] - 2:13	AND ^[3] - 3:2, 3:8, 3:13	business ^[1] - 6:4	clubs ^[1] - 22:10
1	4 ^[1] - 27:6	answer ^[5] - 9:23, 20:15, 23:7, 23:9, 24:2	buy ^[1] - 21:14	Colorado ^[28] - 4:18, 4:21, 5:3, 5:8, 5:11, 5:12, 5:16, 6:12, 6:18, 6:20, 6:22, 6:24, 7:9, 7:10, 7:14, 7:19, 7:24, 8:5, 8:14, 8:19, 8:23, 9:4, 9:9, 9:17, 10:2, 10:6, 10:8, 10:24
10155 ^[1] - 2:5	5	answered ^[1] - 25:23	C	commit ^[1] - 8:2
10281 ^[1] - 2:18	58th ^[1] - 2:4	applied ^[4] - 14:7, 14:12, 14:24, 15:12	C.D ^[1] - 25:6	company ^[1] - 5:13
104,000 ^[1] - 12:3	5:00 ^[1] - 1:14	apply ^[2] - 15:5, 15:15	California ^[6] - 6:21, 10:9, 10:11, 10:14, 10:21, 10:24	compass ^[2] - 5:19, 6:6
11 ^[2] - 24:19, 25:2	5:07 ^[1] - 4:14	April ^[1] - 8:15	cannot ^[2] - 15:5, 15:9	conditional ^[1] - 8:16
11530 ^[1] - 2:10	5:28 ^[1] - 26:13	army ^[1] - 22:21	car ^[2] - 26:3, 26:4	condo ^[7] - 11:21, 11:22, 11:24, 17:12, 17:14, 17:16, 17:21
11596 ^[1] - 2:14	6	arrest ^[1] - 25:9	Case ^[1] - 28:2	condominium ^[1] - 11:23
12404 ^[1] - 4:20	66 ^[1] - 20:20	assault ^[1] - 8:25	cash ^[3] - 12:7, 17:25, 18:13	Condominiums ^[1] - 4:12
14 ^[2] - 1:14, 28:3	666 ^[2] - 1:12, 2:9	associations ^[1] - 22:14	CATHOLIC ^[2] - 1:7, 2:17	condos ^[3] - 17:22, 18:7, 21:15
150 ^[1] - 2:4	7	attend ^[1] - 24:14	Catholic ^[1] - 28:2	conduct ^[1] - 9:11
15th ^[1] - 29:15	700 ^[1] - 2:9	attorneys ^[2] - 2:16, 3:3	cell ^[3] - 20:16, 20:18, 20:25	conspiracy ^[1] - 8:2
17-CV-1336 ^[1] - 1:6	8	Attorneys ^[3] - 2:4, 2:8, 2:12	Centre ^[1] - 28:3	contribute ^[1] - 18:3
18 ^[1] - 14:3	81003 ^[1] - 4:22	August ^[1] - 8:6	CENTRE ^[2] - 1:7, 2:17	convert ^[1] - 12:13
1969 ^[1] - 10:18	A	Aurora ^[1] - 4:21	certainly ^[1] - 22:6	converted ^[1] - 12:14
1980 ^[1] - 10:12	above-mentioned ^[1] - 1:19	authorized ^[1] - 3:16	certification ^[1] - 3:6	copy ^[1] - 17:9
1986 ^[2] - 6:25, 10:12	account ^[18] - 5:2, 5:13, 5:14, 5:15, 5:21, 5:25, 6:2, 6:4, 6:8, 18:14, 18:16, 19:2, 19:3, 19:17, 20:6, 20:8, 20:13	automobile ^[1] - 25:25	CERTIFICATION ^[1] - 29:2	correct ^[22] - 5:17, 7:2, 9:19, 10:25, 11:9, 11:23, 13:2, 13:8, 13:11, 13:14, 15:2, 15:13, 16:3, 16:5, 16:6, 16:17, 17:17, 17:25, 18:19, 21:10, 24:18, 25:3
1987 ^[1] - 7:11	accounts ^[1] - 18:9	Avenue ^[1] - 2:13	certify ^[2] - 29:4, 29:9	CORRECTIONS ^[1] - 28:5
1988 ^[3] - 7:15, 7:20, 8:20	action ^[1] - 29:11	aware ^[2] - 14:15, 14:20	characters ^[2] - 25:16, 25:18	cost ^[1] - 23:5
1989 ^[2] - 7:25, 8:6	address ^[3] - 4:10, 4:19, 4:24	B	charged ^[11] - 7:11, 7:15, 7:20, 7:25, 8:6, 8:15, 8:20, 8:24, 9:10, 9:16, 10:2	counsel ^[1] - 17:8
1996 ^[1] - 8:15	administer ^[1] - 3:16	background ^[1] - 9:6	charges ^[2] - 9:15, 9:21	count ^[1] - 23:15
2		Bangkok ^[2] - 20:6, 20:13	Charles ^[6] - 5:4, 18:10, 18:17, 19:2, 19:23, 20:7	Country ^[2] - 1:12, 2:9
20 ^[2] - 13:19, 26:6		Bank ^[4] - 5:19, 6:6, 20:6, 20:13	checking ^[2] - 18:14, 18:15	country ^[1] - 12:13
2000 ^[1] - 11:3		bank ^[18] - 5:2, 5:5, 5:7, 5:13, 5:14, 5:15, 5:20, 5:25, 6:2, 6:4, 6:7, 6:8, 12:6, 18:15, 19:23, 20:5, 20:13	children ^[7] - 11:16, 16:5, 16:10, 16:15, 22:22, 24:4, 24:22	counts ^[1] - 8:7
2001 ^[1] - 11:3		BARKET ^[1] - 2:7		COURT ^[1] - 1:2
2005 ^[5] - 6:16, 6:22, 8:24, 9:10, 9:16		basis ^[1] - 12:21		Court ^[1] - 3:19
2009 ^[1] - 9:25		bear ^[1] - 13:17		
2010 ^[1] - 4:25		begin ^[1] - 11:10		
2013 ^[1] - 7:7		beginning ^[1] - 10:20		
2015 ^[9] - 4:25, 5:24, 6:9, 6:17, 6:25, 11:12, 11:13, 12:9, 18:21				
20150 ^[1] - 4:13				
2016 ^[1] - 14:4				

covered ^[1] - 9:5 credit ^[1] - 12:5 crime ^[2] - 7:12, 8:8 criminal ^[2] - 9:5, 9:21	effect ^[1] - 3:18 either ^[1] - 29:10 end ^[2] - 10:19 English ^[10] - 22:22, 22:23, 22:24, 23:3, 23:11, 23:18, 24:4, 24:8, 24:11, 25:18	G	July ^[1] - 7:20	LOTURCO ^[1] - 2:7 2
D	EPSTEIN ^[1] - 2:7 ERRATA ^[1] - 28:2 ESQ ^[4] - 2:6, 2:10, 2:14, 2:19 estate ^[1] - 21:11 et ^[1] - 28:3 ex ^[1] - 22:21 exactly ^[1] - 6:14 EXAMINATION ^[1] - 4:16 Examination ^[1] - 27:6 examined ^[1] - 4:5 except ^[1] - 3:9 expats ^[1] - 22:19 explain ^[2] - 23:20, 23:22 extra ^[2] - 23:3, 23:4	H	K	M
Date ^[1] - 28:3 daughter ^[4] - 24:23, 24:25, 25:5, 25:6 DAVEY ^[2] - 2:12, 2:14 DAY ^[1] - 2:16 days ^[3] - 18:22, 24:17, 24:20 December ^[7] - 8:24, 9:10, 9:16, 13:19, 14:3, 14:4 Defendant ^[4] - 1:17, 2:8, 2:12, 2:16 Defendants ^[1] - 1:9 degree ^[2] - 8:7, 8:25 Denver ^[2] - 6:16, 6:23 deposition ^[2] - 3:7, 3:14 DEPOSITION ^[1] - 1:16 Deposition ^[1] - 28:3 DIOCESE ^[2] - 1:7, 2:17 Diocese ^[1] - 28:3 disorderly ^[1] - 9:11 Displaying ^[1] - 17:6 displaying ^[1] - 9:11 DISTRICT ^[2] - 1:2, 1:2 Docket ^[1] - 1:5 DOLLY ^[2] - 29:3, 29:19 Dolly ^[1] - 1:20 driver's ^[1] - 16:20 driving ^[3] - 8:9, 8:10, 10:3 drugs ^[1] - 8:11 DUFFY ^[1] - 2:12 duly ^[2] - 4:3, 29:6 during ^[3] - 4:23, 7:4, 10:23	Examination ^[1] - 27:6 examined ^[1] - 4:5 except ^[1] - 3:9 expats ^[1] - 22:19 explain ^[2] - 23:20, 23:22 extra ^[2] - 23:3, 23:4	half ^[2] - 11:3, 21:15 hand ^[1] - 29:15 heard ^[1] - 14:22 held ^[2] - 1:19, 6:5 hereby ^[1] - 29:4 HEREBY ^[1] - 3:2 herein ^[3] - 1:17, 3:4, 29:5 hereunto ^[1] - 29:14 Hillside ^[1] - 2:13 hold ^[2] - 13:19, 16:25 holding ^[1] - 16:23 house ^[2] - 11:17, 11:20	KEARON ^[1] - 2:7 keep ^[1] - 20:12 kids ^[2] - 19:15, 23:11 kind ^[3] - 5:5, 6:2, 22:21 Klein ^[1] - 27:6 KLEIN ^[9] - 2:10, 4:14, 4:17, 12:2, 23:8, 23:13, 23:19, 23:23, 26:12 KM ^[1] - 25:6	M-O-V-E ^[1] - 21:5 MABILE ^[28] - 2:6, 7:17, 7:23, 8:3, 8:13, 8:18, 9:2, 9:12, 9:22, 10:5, 11:25, 14:19, 15:3, 15:11, 15:14, 17:4, 19:4, 19:7, 20:14, 23:6, 23:12, 23:17, 23:21, 23:25, 25:11, 25:22, 26:6, 26:9 maiden ^[1] - 25:15 March ^[1] - 7:25 marriage ^[4] - 12:14, 13:6, 13:10, 29:10 married ^[1] - 16:4 MARTINS ^[2] - 1:8, 2:13 matter ^[1] - 29:13 MCNIFF ^[1] - 2:12 meet ^[3] - 16:12, 21:22, 25:20 member ^[6] - 21:24, 22:3, 22:7, 22:10, 22:13, 22:15 menacing ^[1] - 8:25 mentioned ^[3] - 1:19, 6:2, 9:14 MERSON ^[1] - 2:3 might ^[2] - 10:20, 11:4 military ^[1] - 22:20 MINION ^[1] - 2:12 minutes ^[1] - 26:6 money ^[3] - 5:10, 15:24, 20:12 month ^[1] - 13:22 morning ^[1] - 4:15 motorcycle ^[1] - 26:4 Move ^[1] - 21:3 move ^[1] - 11:5 moved ^[6] - 6:20, 6:22, 10:21, 18:22, 19:21, 20:23 moving ^[1] - 23:14 MR ^[8] - 4:14, 4:17, 12:2, 23:8, 23:13, 23:19, 23:23, 26:12 MS ^[27] - 7:17, 7:23, 8:3, 8:13, 8:18, 9:2, 9:12, 9:22, 10:5, 11:25, 14:19, 15:3, 15:11, 15:14, 17:4, 19:4, 19:7, 20:14, 23:6, 23:12, 23:17, 23:21, 23:25, 25:11,
E	F	I	L	
East ^[2] - 2:4, 4:20 EASTERN ^[1] - 1:2 ED ^[2] - 12:11, 12:19 educational ^[5] - 12:11, 12:19, 12:21, 12:24, 14:5 Edward ^[2] - 4:9, 28:4 EDWARD ^[2] - 1:16, 26:17	far ^[1] - 19:22 father ^[1] - 23:17 Federal ^[1] - 1:18 FEVOLA ^[2] - 29:3, 29:19 Fevola ^[1] - 1:20 fifth ^[1] - 8:25 filing ^[1] - 3:5 financial ^[1] - 20:2 fine ^[3] - 17:3, 17:9, 19:8 first ^[3] - 4:3, 7:7, 14:5 five ^[2] - 20:24, 24:17 Floor ^[1] - 2:5 follows ^[1] - 4:5 FOR ^[2] - 28:2, 28:6 force ^[1] - 3:17 Foreign ^[1] - 22:18 form ^[3] - 3:10, 8:9, 15:14 forth ^[1] - 29:6 fraternal ^[1] - 22:8 fraud ^[1] - 8:8 friends ^[1] - 22:20 full ^[1] - 24:5 funds ^[2] - 18:3, 20:11 FURTHER ^[2] - 3:8, 3:13	immediately ^[2] - 10:7, 10:14 impersonation ^[1] - 8:9 IN ^[1] - 29:14 incident ^[1] - 9:14 included ^[1] - 24:9 income ^[1] - 21:9 INDEX ^[2] - 27:2, 27:3 influence ^[3] - 8:10, 10:3 institutions ^[2] - 20:3, 22:4 intended ^[1] - 7:4 intention ^[1] - 23:14 interested ^[1] - 29:12 investment ^[1] - 17:14 IS ^[3] - 3:2, 3:8, 3:13 Island ^[1] - 10:16 IT ^[3] - 3:2, 3:8, 3:13	language ^[1] - 12:23 last ^[5] - 13:15, 13:22, 13:24, 25:4, 25:15 Lau ^[2] - 12:15 LAW ^[1] - 2:3 lawyers ^[1] - 15:10 learn ^[4] - 12:22, 12:25, 22:24, 23:11 leave ^[1] - 12:13 left ^[1] - 7:5 less ^[1] - 23:16 letter ^[2] - 20:8, 20:10 license ^[1] - 16:20 life ^[1] - 10:23 lights ^[1] - 19:16 likely ^[1] - 23:16 line ^[1] - 12:5 literally ^[1] - 18:22 live ^[9] - 6:18, 10:7, 10:14, 11:14, 11:17, 11:20, 14:18, 16:15, 19:24 lived ^[10] - 4:18, 4:24, 5:11, 5:12, 6:13, 6:16, 6:24, 10:10, 10:23, 11:2 living ^[21] - 6:11, 7:3, 7:9, 7:10, 7:14, 7:19, 7:24, 8:5, 8:14, 8:19, 8:23, 9:4, 9:9, 9:17, 10:2, 10:6, 10:13, 11:8, 11:10, 15:25, 19:18 LLP ^[1] - 2:7 LN ^[1] - 28:6 local ^[1] - 20:5 location ^[1] - 5:16 locations ^[1] - 10:22 log ^[1] - 20:7 losses ^[1] - 18:12	
		J		
		January ^[4] - 1:14, 7:15, 28:3, 29:15 Japan ^[1] - 19:25 JEREMIAH ^[1] - 2:19 jointly ^[1] - 17:18 JONES ^[1] - 2:16		

25:22, 26:6, 26:9 MULHOLLAND [1] - 2:12 must [1] - 14:17	one [4] - 5:4, 12:10, 12:12, 13:9 One [1] - 12:15 One-day [1] - 12:15 one-year [1] - 13:9 online [1] - 5:6 oOo [1] - 3:21 open [1] - 6:8 opened [4] - 6:7, 18:21, 19:18, 19:20 order [1] - 8:16 organizations [1] - 22:8 original [1] - 14:4 originally [1] - 12:10 otherwise [1] - 11:18 outcome [1] - 29:13 outside [1] - 12:8 own [8] - 11:19, 11:22, 17:11, 17:13, 17:15, 17:18, 18:5, 18:7 owned [1] - 11:18	25:14, 28:2, 28:4 POWERS [3] - 1:4, 1:16, 26:17 powers [1] - 4:15 private [3] - 23:2, 24:13, 24:15 problem [2] - 17:6, 17:10 Procedure [1] - 1:19 process [1] - 25:8 pronounce [1] - 25:17 property [5] - 7:11, 8:8, 17:11, 18:6, 21:16 provider [1] - 21:2 Public [3] - 1:21, 4:4, 29:3 PUBLIC [2] - 26:23, 28:24 pursuant [2] - 1:18, 13:5 put [1] - 18:24	robbery [1] - 8:2 ROBERT [2] - 1:8, 2:8 Rockville [1] - 28:3 ROCKVILLE [2] - 1:7, 2:17 Roman [1] - 28:2 ROMAN [2] - 1:7, 2:17 Rules [1] - 1:18	stating [1] - 12:25 stay [1] - 7:4 stepdaughter [2] - 24:19, 24:24 still [4] - 5:20, 6:7, 6:8, 25:7 STIPULATED [3] - 3:2, 3:8, 3:13 stock [1] - 18:12 store [1] - 19:23 Street [2] - 2:4, 2:18 stuff [1] - 22:21 Subscribed [2] - 26:19, 28:22 Suite [1] - 2:9 support [2] - 15:22, 22:16 sworn [6] - 3:15, 3:18, 4:3, 26:19, 28:22, 29:6
N	P	R	S	T
name [10] - 4:7, 14:20, 14:23, 17:16, 17:23, 25:4, 25:5, 25:7, 25:13, 25:15 Name [1] - 28:2 navy [1] - 22:21 never [2] - 14:22, 14:24 NEW [1] - 1:2 New [12] - 1:12, 1:21, 2:5, 2:10, 2:14, 2:18, 4:4, 10:16, 10:23, 29:4 non [2] - 13:6, 13:7 Non [1] - 14:13 NOTARY [2] - 26:23, 28:24 Notary [3] - 1:20, 4:4, 29:3 note [10] - 7:17, 7:23, 8:3, 8:13, 8:18, 9:2, 9:12, 9:22, 10:5, 19:4 noted [1] - 26:13 nothing [1] - 15:15 noting [1] - 23:25 November [5] - 9:25, 11:12, 13:18, 13:19, 14:2 NOW [1] - 28:6 number [4] - 18:25, 19:2, 20:18, 20:22	p.m [2] - 1:14, 26:13 Pacific [1] - 4:20 Page [1] - 27:4 paid [2] - 12:7, 21:15 paradise [1] - 4:11 Park [2] - 2:14, 4:11 parole [1] - 8:20 parties [2] - 3:4, 29:10 passport [2] - 13:18, 20:10 path [1] - 14:9 Pattaya [1] - 4:12 pay [7] - 11:24, 17:24, 21:6, 21:18, 22:25, 24:3, 24:7 paying [1] - 23:10 Pennsylvania [1] - 11:2 per [1] - 5:5 percent [1] - 21:16 permanent [7] - 14:8, 14:12, 14:13, 14:16, 14:25, 15:6, 15:13 personal [2] - 5:13, 5:15 PG [1] - 28:6 phone [3] - 20:16, 20:19, 20:22 photo [1] - 20:9 place [1] - 1:20 Plaintiff [3] - 1:5, 1:17, 2:4 PLLC [1] - 2:3 Powers [5] - 4:9, 25:6,	READ [1] - 28:6 reading [1] - 15:9 READS [1] - 28:6 real [3] - 17:11, 18:5, 21:11 really [1] - 17:7 REASON [1] - 28:6 record [4] - 4:7, 18:25, 25:9, 29:7 related [1] - 29:9 release [1] - 8:16 relevant [2] - 23:11, 23:19 religious [1] - 22:4 remember [2] - 4:21, 4:22 renew [1] - 13:11 renewed [3] - 13:13, 13:16, 13:24 rental [1] - 17:13 rented [1] - 11:18 repeat [1] - 11:7 REPORTER [1] - 4:6 reserved [1] - 3:11 residency [3] - 14:16, 15:6, 15:13 resident [3] - 14:8, 14:12, 14:25 Resort [1] - 4:11 respective [1] - 3:4 retired [2] - 15:18, 22:20 risk [1] - 18:11 Road [2] - 1:12, 2:9	saturday [1] - 24:21 savings [1] - 16:2 school [5] - 13:2, 23:2, 24:13, 24:14, 24:15 schooling [3] - 24:5, 24:11, 24:12 Schwab [6] - 5:4, 18:10, 18:17, 19:2, 19:23, 20:8 scooter [2] - 26:5 scope [1] - 9:24 se [1] - 5:5 sealing [1] - 3:5 second [3] - 8:7, 16:25, 17:13 see [1] - 14:2 send [2] - 17:8, 20:9 separate [3] - 18:5, 24:11, 24:12 service [1] - 20:25 set [2] - 29:6, 29:15 shall [1] - 3:11 SHEET [1] - 28:2 SHOULD [1] - 28:6 Signature [1] - 28:20 signed [3] - 3:15, 3:18, 20:10 Sira [1] - 25:14 six [1] - 24:20 sleeping [2] - 19:15 Soi [1] - 4:12 someone [1] - 17:19 son [1] - 24:23 sorry [1] - 7:10 sort [1] - 12:5 speaks [1] - 23:17 spell [1] - 21:4 spoken [1] - 15:9 Springs [1] - 6:22 ST [2] - 1:8, 2:13 starting [1] - 24:20 state [1] - 6:25 State [5] - 1:21, 4:4, 4:7, 4:10, 29:4 States [2] - 12:6, 19:19 STATES [1] - 1:2	tax [1] - 21:11 taxes [3] - 21:6, 21:17, 21:18 testified [1] - 4:5 testimony [2] - 29:5, 29:8 TESTIMONY [1] - 27:3 Thai [5] - 12:22, 12:25, 13:2, 22:23, 25:7 Thailand [34] - 4:13, 7:7, 10:24, 11:6, 11:8, 11:11, 11:15, 12:6, 12:9, 12:16, 12:17, 13:5, 14:16, 14:25, 15:17, 15:20, 15:23, 16:8, 16:13, 16:21, 17:12, 19:21, 20:4, 21:6, 21:12, 21:19, 21:25, 22:5, 22:8, 22:11, 22:14, 25:10, 25:21, 26:2 THAT [3] - 29:5, 29:7, 29:12 THE [4] - 4:6, 26:8, 26:10, 28:2 theft [1] - 8:7 three [3] - 8:7, 24:25, 25:2 threshold [1] - 21:23 Tim [4] - 14:20, 19:7, 19:10, 26:7 TIMOTHY [3] - 1:4, 1:16, 26:17 Timothy [3] - 4:9, 28:2, 28:4 TO [1] - 27:3
O				
oath [1] - 3:17 objection [16] - 7:17, 7:23, 8:3, 8:13, 8:18, 9:2, 9:12, 9:22, 10:5, 11:25, 15:14, 19:4, 20:14, 23:6, 24:2, 25:11 objections [1] - 3:9 obtaining [1] - 12:21 OF [5] - 1:2, 1:7, 1:16, 2:17, 28:2 offense [1] - 9:14 offenses [1] - 8:11 officer [1] - 3:16 Old [2] - 1:12, 2:9 old [2] - 24:19, 24:25				

<p>TODD ^[1] - 2:19 TOURS ^[2] - 1:8, 2:13 towards ^[1] - 23:15 town ^[1] - 5:18 transcript ^[1] - 29:7 TRANSCRIPT ^[1] - 28:2 transfer ^[1] - 20:9 traveled ^[1] - 12:8 trial ^[1] - 3:12 tried ^[1] - 25:17 trip ^[1] - 12:15 Tru ^[1] - 21:3 TRU ^[1] - 21:5 true ^[1] - 29:7 trying ^[1] - 25:8 turn ^[1] - 19:16 tutored ^[2] - 24:4, 24:8 tutoring ^[2] - 23:3, 23:4 two ^[6] - 11:16, 18:7, 20:11, 21:14, 21:15, 24:22 two-and-a-half ^[1] - 21:15 type ^[2] - 12:18, 20:8</p>	<p style="text-align: center;">W</p> <p>waived ^[1] - 3:7 wallet ^[1] - 16:24 Wan ^[1] - 25:14 Wars ^[1] - 22:18 Wat ^[1] - 4:12 weapon ^[1] - 9:11 week ^[3] - 19:20, 24:17, 24:20 WHEREOF ^[1] - 29:14 wife ^[8] - 11:16, 16:7, 16:12, 16:15, 18:2, 19:14, 26:4, 26:5 wife's ^[2] - 25:6, 25:13 Williston ^[1] - 2:14 wire ^[2] - 20:9, 20:11 WITNESS ^[3] - 26:8, 26:10, 29:14 witness ^[2] - 29:5, 29:8 Witness ^[1] - 28:4 works ^[1] - 14:14</p>
<p style="text-align: center;">U</p> <p>U.S ^[2] - 12:3, 24:6 under ^[3] - 8:9, 8:10, 10:3 unions ^[1] - 21:24 Unit ^[1] - 4:20 UNITED ^[1] - 1:2 United ^[2] - 12:5, 19:18 up ^[2] - 20:8, 26:7 utilize ^[1] - 18:11</p>	<p style="text-align: center;">Y</p> <p>year ^[10] - 11:3, 11:5, 12:12, 13:3, 13:9, 13:12, 13:13, 14:5, 24:6, 24:19 year-and-a-half ^[1] - 11:3 year-old ^[1] - 24:19 yearly ^[2] - 21:14, 21:16 years ^[5] - 4:23, 6:15, 10:17, 20:24, 24:25 YORK ^[1] - 1:2 York ^[12] - 1:12, 1:21, 2:5, 2:10, 2:14, 2:18, 4:4, 10:16, 10:23, 29:4 yourself ^[1] - 15:22</p>
<p style="text-align: center;">V</p> <p>Vesey ^[1] - 2:18 veterans ^[1] - 22:18 VFW ^[2] - 22:16, 22:17 violating ^[1] - 8:16 violation ^[1] - 8:21 virtual ^[1] - 5:5 visa ^[14] - 12:11, 12:12, 12:18, 12:21, 12:24, 13:4, 13:9, 13:10, 13:25, 14:6, 14:8, 14:12, 14:13, 14:16 visit ^[1] - 7:8 vs ^[1] - 28:2</p>	<p style="text-align: center;">Z</p> <p>zip ^[1] - 4:22</p>